

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VISIBLE SYSTEMS CORPORATION,

Plaintiff

v.

UNISYS CORPORATION,

Defendant

Civil Action No. 04-CV-11610-RGS

**PLAINTIFF'S MOTION FOR LEAVE
TO FILE REPLY MEMORANDUM**

Pursuant to Local Rule 7.1(B)(3), Plaintiff Visible Systems Corporation (Visible) hereby moves the Court for leave to file a Reply Memorandum in support of Visible's motions to compel and replying to the Opposition filed by Unisys Corporation (Unisys) on April 19, 2006.

In its Opposition, Unisys has made extensive complaints about Visible's conduct in discovery, which call for a concise response. Unisys has also raised matter for the first time – *e.g.*, an attempt to substantiate the burden of electronic searches – to which Visible responds in its Reply Memorandum.

Plaintiff VISIBLE SYSTEMS CORPORATION,

By its attorneys:

/s/ Stephen H. Galebach

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Dated: April 21, 2006

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/s/ Stephen H. Galebach
Stephen H. Galebach